

CHAPTER 5: CONSULTATION AND COORDINATION



PUBLIC INVOLVEMENT AND SCOPING

During a series of scoping meetings, the NPS requested input from the public, from federal, state, and local agencies, and from park resource specialists on fire management concerns, the types of issues that should be addressed in the EIS, and the range of fire management alternative strategies that should be considered.

On January 27, 2000, a “Notice of Scoping for Fire Management Plan at Point Reyes National Seashore” was published in the Federal Register. On January 29, 2000, at a public meeting of the Point Reyes National Seashore Citizen Advisory Commission, a presentation was given announcing the scoping period for the plan. Scoping comments were solicited from January 27, 2000 to March 28, 2000.

In addition to the Federal Register Notice, the scoping period was publicized through a mass mailing to the public that included background information on the FMP and a notice of a scoping workshop held March 9, 2000. Notices posted in the communities surrounding the park and a notice in the local weekly newspaper, the Point Reyes Light, also advertised the workshop. The two-hour March 9 public scoping workshop was attended by five citizens.

On February 14, 2000 and on February 22, 2000, internal scoping sessions were conducted to identify staff issues and concerns. These meetings were attended by an interdisciplinary group of resource and fire specialists from the PRNS and GGNRA staff.

On March 28, 2000, a two-hour scoping session was held for local fire agencies. In addition to representatives of the NPS Fire Management Office, members of the Marin County Fire Department, Inverness Volunteer Fire Department, California State Parks, and Marin Municipal Water District were in attendance. Also invited, but not attending, were the Marin County Open Space District, Bolinas Fire Protection District, Nicasio Volunteer Fire Department, and Stinson Beach Fire Department.

In spring of 2001, the NPS conducted a two-hour meeting to provide an overview to the Marin County Fire Department of the preliminary alternatives, and consulted on possible changes and/or modifications.

The draft EIS for the Fire Management Plan was released for public comment on February 20, 2004. The comment period closed April 20, 2004. Seven written comment letters were received; they are addressed below.

The Federated Indians of Graton Rancheria have been consulted for compliance with the Native American Graves Protection and Repatriation Act.

COMPLIANCE STATUS

Documentation of NPS compliance with federal and state laws and regulations is incorporated into the text of the FEIS. Compliance with the nine major federal laws, executive orders, and associated state regulations is summarized here.

National Environmental Policy Act (NEPA) of 1970. PL 91-190, 83 Stat. 852, 42 USC §4341 et seq. The Final EIS provides disclosure of the planning and potential environmental consequences of the proposed action and alternatives, as required by NEPA. All substantive comments received on the draft EIS are responded to in this final EIS. In addition, an alternative is identified as preferred. A record of decision will be published 30 days following publication of the final plan and environmental impact statement. It will identify the selected alternative, which, barring unforeseen circumstances, will be the same as the preferred alternative in the final EIS (Alternative C). At that time, the selected alternative will be implemented.

Endangered Species Act of 1973, as amended, PL 93-205, 87 Stat. 884, 16 USC §1531 et seq. The Endangered Species Act protects threatened and endangered species, as listed by the U.S. Fish and Wildlife Service, from unauthorized take, and directs federal agencies to ensure that their actions do not jeopardize the continued existence of such species. Section 7 of the act defines federal agency responsibilities for consultation with the U.S. Fish and Wildlife Service and National Marine Fisheries Service (for fish) and requires preparation of a Biological Assessment to identify any threatened or endangered species that is likely to be affected by the proposed action. The National Park Service initiated consultation on February 9, 2001 and continues consultation with the U.S. Fish and Wildlife Service and the National Marine Fisheries Service. See Appendix D for biological opinion from the USFWS.

Archeological Resources Protection Act of 1979, PL 96-95, 93 Stat. 712, 16 USC §470aa et seq. and 43 CFR 7, subparts A and B, 36 CFR. This act secures the protection of archeological resources on public or Indian lands and fosters increased cooperation and exchange of information between private, government, and the professional community in order to facilitate the enforcement and education of present and future generations. It regulates excavation and collection on public and Indian lands. It requires notification of Indian tribes who may consider a site of religious or cultural importance prior to issuing a permit. The NPS will meet its obligations under this Act in all activities conducted in the Fire Management Plan.

National Historic Preservation Act of 1966, as amended, PL 89-665, 80 Stat. 915, 16 USC §470 et seq. and 36 CFR 18, 60, 61, 63, 68, 79, 800. The National Historic Preservation Act requires agencies to take into account the effects of their actions on properties listed in or eligible for listing in the National Register of Historic Places. The Advisory Council on Historic Preservation has developed implementing regulations (36 CFR 800), which allow agencies to develop agreements for consideration of these historic properties. The NPS, in consultation with the Advisory Council, the California State Historic Preservation Officer (SHPO), American Indian tribes, and the public has developed a Programmatic Agreement for operations and maintenance activities on historic structures. This Programmatic Agreement provides a process for compliance with National Historic Preservation Act, and includes stipulations for identification, evaluation, treatment, and mitigation of adverse effects for actions affecting historic properties. The NPS sent a scoping notice to the state historic preservation officer and the Advisory Council for Historic Preservation to initiated consultation. Consultation will continue throughout the planning process.

American Indian Religious Freedom Act, PL 95-341, 92 Stat. 469, 42 USC §1996. This act declares policy to protect and preserve the inherent and constitutional right of the American Indian, Eskimo, Aleut, and Native Hawaiian people to believe, express, and exercise their traditional religions. It provides that religious concerns should be accommodated or addressed under NEPA or other appropriate statutes. The National Park Service, as a matter of policy, will be as nonrestrictive in permitting Native American access to and use of an identified traditional sacred resource for traditional ceremonies.

Executive Order 11988: Floodplain Management. This Executive Order requires federal agencies to avoid, to the extent possible, adverse impacts associated with the occupancy and modification of floodplains, and to avoid development in floodplains whenever there is a practical alternative. If a proposed action is found to be in the applicable regulatory floodplain, the agency shall prepare a floodplain assessment, known as a Statement of Findings. All of the actions proposed in the Fire Management Plan are consistent with this executive order.

Executive Order 11990: Protection of Wetlands. This Executive Order established the protection of wetlands and riparian systems as the official policy of the federal government. It requires all federal agencies to consider wetland protection as an important part of their policies and take action to minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands. All of the actions proposed in the Fire Management Plan are consistent with this executive order.

Executive Order No. 13112: Invasive Species. This Executive Order prevents the introduction of invasive species and directs federal agencies to not authorize, fund, or carry out actions that it believes are likely to cause or promote the introduction or spread of invasive species. Actions proposed in the FEIS include measures to prevent the introduction and spread of invasive species.

California Coastal Zone Management Act. This act protects coastal environments. While this act transferred regulatory authority to the States and excluded federal installations from the definition of the “coastal zone,” it requires that federal actions be consistent with state coastal management plans. Activities taking place within the coastal zone under the definition established by the California Coastal Management Plan require a federal consistency determination. The FEIS will be submitted to the Coastal Commission for federal consistency determination.

LIST OF PREPARERS

Dawn Adams, Inventory and Monitoring Coordinator, BS, General Biology, University of Illinois.

Barbara Moritsch, Plant Ecologist; BS, Resource Planning and Interpretation, Humboldt State University; MS, Environmental Science, Oregon State University.

Natalie Gates, Wildlife Biologist; BA, Biology, Harvard University; DVM Cornell University; MS, Environmental Science and Policy, University of California, Berkeley Campus.

Sarah Allen, Ph.D, Science Advisor, University of California, Berkeley Campus, MS at University of California, Berkeley Campus; BS, Conservation of Natural Resources, University of California, Berkeley Campus.

Don Neubacher, Superintendent; BS, Environmental Planning, University of California, Davis Campus; MS Resource Management, Humboldt State University.

Brannon Ketcham, Hydrologist, BA, Geology, Ponomo College; MEM, Water Resources Management, Duke University.

Wendy Poinot, Environmental Planner, BA, Park History, Colorado State University.

Roger Wong, Fire Management Specialist, BS, Forestry, University of California, Berkeley.

Gary Fellers, Ph.D, Research Scientist, US Geological Services, Biological Resources Division.

Gordon White, Historical Architect, MA, Architecture, University of California, Berkeley.

Jane Rodgers, Plant Ecologist, BS, Forestry, University of California, Berkeley.

LIST OF CONSULTANTS

URS: Jeremy Rowlands, Air Quality
Chris Johnson, Air Quality

Heidi West, Ph.D., Total Quality NEPA

PARTICIPATING GOVERNMENTAL AGENCIES

List of Agencies and Organizations to Whom Copies or Notice of the Final Environmental Impact Statement have been Sent

Federal Agencies

U. S. Army Corps of Engineers

U. S. Coast Guard
U. S. Department of Commerce National Oceanic and Atmospheric Administration
U. S. Geological Service
U. S. Fish and Wildlife Service
U. S. Natural Resources Conservation Service
U. S. National Marine Fisheries

Federal Advisory Groups

Advisory Council for Historic Preservation

Elected Officials

California State Assemblyperson Joe Nation
California State Senator John Burton
Marin County Supervisor Steve Kinsey
U. S. Representative Lynn Woolsey
U. S. Senator Barbara Boxer
U. S. Senator Dianne Feinstein

State Agencies

Bay Area Air Quality Management District
Bodega Marine Lab
California Coastal Commission
State of California Department of Environmental Science
State of California Department of Fish and Game
State of California Department of Parks and Recreation
State of California Department of Transportation
State of California Office of Planning and Resources State Clearinghouse
State Historic Preservation Office
University of California, Berkeley
University of California Cooperative Extension

Regional, County, and Municipal Agencies

Bolinas Fire Department
Bolinas Community Public Utility District
Inverness Fire Department
Marin Humane Society
Marin County Community Development Agency
Marin County Fire Department
Marin County Open Space
Marin County Planning and Acquisition
Marin County Sheriff's Department
Marin County Resource Conservation District
Marin Municipal Water District
Nicasio Fire Department
San Francisco Regional Water Quality Control Board
Sonoma County Agriculture Preservation and Open Space District

Sonoma County Water Agency

Non-Governmental Organizations, Non-Profit Organizations, etc.

Animal Protection Institute
Audubon Canyon Ranch & Cypress Grove Preserve
Bay Area Ridge Trail Council
Bay Institute
Bayrose Morgans
Bicycle Trails Council
Bollinas Community Parks Planning
California Native Plant Society
Coastwalk
Committee for the Preservation of Tule Elk
Defenders of Wildlife
East Shore Planning Group
Environmental Action Committee of West Marin
Environmental Forum of Marin
Federated Indians of Graton Rancheria
Friends of the Estero
Gardener's Guild
In Defense of Animals
Inverness Association
Inverness Ridge Association
Marin Agricultural Land Trust
Marin Audubon Society
Marin Conservation League
Marin County Farm Bureau
Marin Horse Council
Mow Our Weeds
National Parks and Conservation Association
National Trust for Historic Preservation
North American Trail Ride Conference
Point Reyes Bird Observatory
Point Reyes Light
Point Reyes Village Association
Preserve Historic Olema Valley
Sierra Club, Marin Group
Sonoma Horse Council
Sonoma County Farm Bureau
Sustainable Conservation
Tomales Bay Advisory Committee
Trout Unlimited
Trust for Public Lands
Vedanta Society
Waste Watch
West Marin Chamber of Commerce

West Marin Community Radio
West Marin Paths
Wilderness Society

Libraries

Bolinas Library
Inverness Library
Marin County Library
Point Reyes Library
Stinson Beach Library
Marin County Civic Center Library
San Francisco Main Public Library

COMMENTS RECEIVED AND NPS RESPONSES TO COMMENTS

I. Introduction

In accordance with the National Environmental Policy Act (NEPA) and National Park Service (NPS) policy on compliance with NEPA, all substantive comments received during the 60-day public comment period for the Point Reyes National Seashore Fire Management Plan, Environmental Impact Statement (EIS), were considered and responded during the preparation of this Final EIS. Substantive comments are generally defined as those that raise, debate or question, within a reasonable basis, the accuracy of the information presented or adequacy of the range of alternatives or assessment conducted. Other comments received, such as those that focus on agency policy, express a preference for an alternative or address issues beyond the scope of fire management planning at Point Reyes National Seashore (PRNS) are noted without specific response.

A notice of availability for the Draft EIS was published in the federal register and the document made available for public review on February 20, 2004. The 60-day public comment period ended on April 20, 2004. A public workshop to provide information to the public on the Draft EIS was held at the Red Barn meeting room at PRNS on the evening of March 18, 2004. No verbatim recording of the discussion at the meeting was made in order to allow an informal question and answer format, which is difficult to transcribe. NPS staff gave a presentation on fire management planning actions at PRNS and more specifically on the proposed alternatives presented in the Draft EIS. The presentation was followed by an open question and answer period with the public. The public was encouraged to submit comments on the FMP Draft EIS to NPS offices at PRNS by email, fax or regular mail.

The FEIS will be mailed to the same distribution list as the DEIS. Both the DEIS and this FEIS will be available on the PRNS website at: www.nps.gov/pore/pphtml/documents.html.

This section of the Final EIS is structured as follows:

- I. Introduction
- II. Comment Letters. *Seven comment letters on the Draft EIS were received. Each letter is numbered, as is each specific comment within the letter. The markup on the letters in this chapter should be used as an index to find the appropriate response to that comment in Chapter III.*
- III. Comments Received and Response to Comments. *Responses are presented for substantive comments. Solely to facilitate the matching of comments and responses between the two chapters, each specific comment is presented in a brief paraphrase. The full comment can be referenced in Chapter II. Any changes needed to Draft EIS text based on the specific comment are noted in the response with underline marking new text and strikeout noting deleted text.*

II. Comment Received and Response to Comments

[Note: Changes to be made to Draft EIS text are presented as ~~strikeout~~ for removed text and underline for new or replacement text.]

Comment Letter 1. United States Environmental Protection Agency, San Francisco, CA.
Lisa B. Hanf, Manager, Federal Activities Office.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-1901

LT67

April 15, 2004

Don Neubacher, Superintendent
Point Reyes National Seashore
Point Reyes, CA 94956

RECEIVED	APR 21 04
Point Reyes	
National Seashore	
ASST. DIR.	
SPEC. PL. MGR.	
ADM. ENG'G.	
RES. SCIENCE	
PLANNING	
ENV. CONC.	
TECH. MGT.	
INTEG.	
CLT. RES.	
MONIT.	
CONTRACTING	
PERSONNEL	
BUDGET	
OFFICE FILES	

Subject: Draft Fire Management Plan and Draft Environmental Impact Statement (DEIS) for Point Reyes National Seashore and North District of Golden Gate National Recreation Area [CEQ #040066]

Dear Mr. Neubacher:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementation Regulations at 40 CFR 1500-1508, and Section 309 of the Clean Air Act.

We have rated this DEIS as LO -- "Lack of Objections" (see enclosed "Summary of Rating Definitions"). Alternative C is the National Park Service's preferred alternative because it would involve increased efforts to enhance natural resources while reducing hazardous fuels. While we support this alternative, we have a few additional recommendations.

**Comment
1-1**

The DEIS indicates that all watersheds sampled for the Point Reyes National Seashore Water Quality Monitoring Report had total suspended solids that exceed the recommended standard. Furthermore, Tomales Bay and Lagunitas Creek and Walker Creek watersheds are listed as impaired waters under Clean Water Act Section 303(d). It is unclear from the DEIS what specific measures will be taken to improve water quality in these watersheds. We recommend that your office work closely with the California Regional Water Quality Control Board (CRWQCB) to develop specific management measures that will not only offset fire management impacts, but actually improve water quality in these watersheds. These measures should be described in the Final Environmental Impact Statement (FEIS).

**Comment
1-2**

The CRWQCB recently released the proposed total maximum daily load (TMDL) and implementation strategy for pathogens in Tomales Bay, and will be developing and adopting TMDLs and their implementation plans over the next several years for the other pollutants impairing Tomales Bay, Lagunitas Creek and Walker Creek. We recommend that your office work closely with the CRWQCB as you develop individual bum plans to ensure consistency with the TMDL implementation plans as they are developed for these impaired watersheds.

Printed on Recycled Paper

Comment 1-1. In light of exceedences of levels of total dissolved solids (TSS) noted in the DEIS for PRNS watershed, the US EPA recommends that NPS work closely with the RWQCB and develop specific management measures to offset potential effects of fire management actions and to improve water quality overall.

Response to Comment 1- 1. The NPS is working in conjunction with the RWQCB, and in partnership with ranchers leasing lands within PRNS, to implement agricultural improvements aimed at reducing impacts on water quality. The park and leaseholders have developed several initiatives to reduce the levels of TSS and other pollutants and correct source areas for erosion on the ranchlands. Examples of these initiatives include the McClure diary barn, funded entirely by the leaseholder, which will house their herd during the winter, permitting their removal from several open pastures during rainy season. On this and other ranches, PRNS has fenced cattle out of creek channels, seasonal drainages and wetlands. On the Stewart Ranch, a grassed buffer strip was construction between high use horse pens and Olema Creek to filter out sediment from runoff. Sediment basins were constructed at the Nunes and Giacomini Ranches to trap runoff from the concentrated use areas of the ranches and avoid deposition of the runoff into creeks and drainages.

Comment 1-2. US EPA recommends that the NPS work with RWQCB to assure that FMP actions not only offset potential project affects but work to improve water quality in the Tomales Bay, Lagunitas Creek and Walker Creek watersheds. The NPS should assure that prescribed burn plans remain consistent with the Total Maximum Daily Level (TMDL) implementation plans currently being developed.

Response to Comment 1-2. Mitigation measures to protect water quality and water resources are listed in the Draft EIS on pages 57-58. Measure W-1 calls for a review of the erosion control plan for each prescribed burn. In response to Comment 1-2, the following text change will be made to Mitigation Measure W- 1 in the Final EIS:

W-1. Individual burn plans will ~~would~~ be written with enough detail to determine the extent of erosion within the burn area due to a) the prescribed burn and/or, b) mechanical treatments. Subject matter experts will ~~would~~ determine if the erosion control plan submitted is sufficient to prevent long-term moderate or major impacts to the water resources and water quality and will assure project compliance with the TDML implementation plans for Tomales Bay, Lagunitas Creek and Walker Creek, according to availability through adoption by the EPA. Strategies to minimize erosion and sediment transport to water resources associated with prescribed burning include avoiding overly steep slopes, timing burns to minimize erosion potential, or using erosion control devices after bums. Strategies to minimize erosion and sediment transport to water resources associated with mechanical treatment include avoiding overly steep slopes, avoiding scraping or clearing to bare mineral soil (leave duff layer), or installing erosion control devices as part of mechanical treatment (if necessary).

Comment
1-3

The DEIS indicates that your office initiated consultation with the U.S. Fish and Wildlife Service in 2001 for this fire management plan. We recommend that the biological opinion for this plan be included in the FEIS.

We appreciate the opportunity to review this DEIS and request a copy of the FEIS when it is filed with our Washington, D.C. office. If you have any questions, please call me at (415) 972-3854, or have your staff call Jeanne Geselbracht at (415) 972-3853.

Sincerely,



Lisa B. Hanf, Manager
Federal Activities Office

004315

Enclosure

Comment 1-3. US EPA recommends that the biological opinion from the US Fish and Wildlife Service for the PRNS FMP be included in the FEIS.

Response to Comment 1-3. The biological opinions received from the US Fish and Wildlife Service and the National Oceanic and Atmospheric Administration on the FMP are included in this Final EIS. The biological opinions present the conclusions of these agencies on the potential affect of the FMP on species listed by the federal government under the Endangered Species Act.

Comment 2-1. Please revise Draft EIS text on page 31 to conform with BAAQMD Regulation 5 which does not allow the movement of vegetation debris to a central location for pile burning unless approved by the Air Pollution Control Officer.

Response to Comment 2-1. Draft EIS text on page 31 is revised as follows in the Final EIS:

“Tools used for these tasks include weed-whackers, chain saws, pole saws, and a chipper towed to the site by a truck. Vegetation debris can be cut up and broadcast in the immediate area, or piled and burned. Debris that is not broadcast on site is chipped and hauled to Beebe Ranch and stockpiled. In accordance with BAAQMD Regulation 5, debris piles are not burned at could only be burned at Beebe Ranch with the approval of the Air Pollution Control Officer. Chipped material is not burned.”

Comment 2-2. Please revise Draft EIS text on page 34 to include reporting wildland fires to BAAQMD.

Response to Comment 2-2. Draft EIS text on page 34 is revised as follows in Final EIS:

“In the event of wildland fire, the P/FIO would work closely with visiting FIOs who may be part of Incident Management Teams to assure the park message is delivered accurately and effectively. Wildland fires will also be reported to the BAAQMD as soon as possible. Media and public queries would receive prompt replies and would contain information about the fire, the fire management plan, and ecosystem restoration as appropriate.”

Comment 2-3. Please revise Draft EIS text on pages 36 to 37 and page 177 to reflect BAAQMD approval procedures for prescribed burns and correct that all prescribed burns require BAAQMD approval and submittal of a burn plan.

Response to Comment 2-3. Draft EIS text on pages 36-37 is revised as follows in Final EIS. Note that the order of some of the text has been changed.

The burn plan is submitted to an outside expert, and both the expert and the park’s Fire Management Officer provides a recommendation to the superintendent. After the burn plan is approved by the superintendent, an application for permission to conduct a prescribed burn is made to the BAAQMD.

The burn plan estimates the percentage of the unit covered by different fuel types and of the tons of material to be burned. This information is fed into an air quality model for the burn, which is submitted as part of the application for approval submitted ~~application to the Bay Area Air Quality Management District (BAAQMD).~~ BAAQMD approval requires that the NPS submit a smoke management plan (SMP) and completed application materials for all prescribed burns at least 30 days prior to the proposed burn date.

With the approval of the smoke management plan, the NPS begins final planning for the prescribed burn and the project site is prepped for the burn. To prepare for a burn in grassland habitat, a line is mowed around the perimeter of the burn by cutting grasses with either a weed

whacker, mower, or tractor. In shrub or forested habitats a fire line (approximately 18 to 24 inches wide) is cut and cleared and vegetation density reduced as described above under the heading "Suppression of Unplanned Ignitions". Whenever possible, roads and trails are used as fire lines to reduce the amount of line that must be created. A hose lay is set up along the burn perimeter no more than one week prior to the bum. If the bum is being conducted in non-native tree or shrub stands (e.g., Monterey pine or Scotch broom), the non-natives may be cut down or mowed and left in the burn unit to dry before burning. This increases mortality of the targeted non-native species.

As the proposed burn day approaches, NPS staff contact BAAQMD's Meteorology and Data Analysis section which provides forecasting services to assist with tentative scheduling of prescribed bums. The MDA section will provide 96-hour, 72-hour, 48-hour and 24-hour forecasts and a 24-hour confidence level of receiving the final approval on the day of the burn itself. The NPS telephones BAAQMD between 8:30 a.m. and 1:30 p.m. on the burn day to receive final approval and an acreage burning allocation for that day. BAAQMD requires verification that the meteorological conditions fall within the range described in the SMP. On the day of the prescribed fire, The BAAQMD makes a final decision based on wind and weather as to whether it would permit the burn.

Prescribed fire personnel monitor the fire until dark or until the perimeter is secured. Personnel would stay on site overnight for burns in forested habitats. The burn area is patrolled the day after burning by walking the perimeter and doing any additional mop up activities required. As required by BAAQMD, the total acreage of burned vegetation is reported by telephone to them noon the day following the prescribed burn."

Revisions on Page 176, paragraph 4 in DEIS.

"San Francisco Bay Area Air Quality Management District (BAAQMD). BAAQMD is the air quality management district for the project area and has primary responsibility for control of air pollution from prescribed burning. BAAQMD has procedures that must be followed prior to implementation of a prescribed bum plan. For all prescribed fire, fires less than 100 acres, BAAQMD requires that burns be conducted on an "allowable burn day" unless the district has granted a variance I advance. Notice of an allowable burn day is posted by the BAAQMD each afternoon for burns planned for the following day. Following the burn, the fire agency must submit information on the fuel types burned to BAAQMD. Burns 100 acres or larger in size BAAQMD requires submission of the individual bum plan to the BAAQMD at least one month prior to the proposed bum. BAAQMD then issues a forecast 72 hours prior to the proposed date and gives a final commitment to permit the burn on the day of the bum itself though forecasts with increasing confidence can be obtained at 96-hours, 72-hours, 48-hours and 24-hours prior to the burn day to support moving forward on all the logistical planning needed to conduct a prescribed burn. 48 hours prior to the date allowing flexibility in planning needed for larger burns."

Mr. Don L. Neubacher

-2-

April 23, 2004

the burn day to request an acreage burning allocation and to confirm the burn day status. The BAAQMD provides prescribed burn forecasting services to assist with the tentative scheduling on a permissive burn day. Our Meteorology and Data Analysis (MDA) section can be reached at (415) 749-4913. The MDA section can provide 96-hour, 72-hour, 48-hour, and 24-hour forecasts and a 24-hour confidence level of receiving the acreage burning allocation desired for the following day.

Comment
2-3

Prescribed burning is not allowed until an acreage burning allocation has been received by the BAAQMD. In addition, the meteorological conditions from the approved SMP must be verified prior to ignition. The BAAQMD requires that the total acreage of burned vegetation be reported back to us by noon on the following day. In addition to calling the phone number provided earlier, current burn day status can also be obtained by calling the BAAQMD Burn Status Recording line at (800) 792-0787. After 3:00 pm, the recording also provides the following day's burn forecast. A prescribed burn of any size, not just 100 acres or more, as incorrectly stated on page 177, must satisfy these requirements and follow these procedures.

Comment
2-4

We understand that part of the preferred alternative may include prescribed burning for wetland areas within the Park. Burning in wetlands is subject to marsh management fire requirements found in sections 401.13 and 410 of Regulation 5: Open Burning. Please visit our website for more details on the District's Policies and Procedures for this regulation: http://www.baaqmd.gov/enfotherinfo/PPNP/REG5_PNPfinal.pdf.

Comment
2-5

Table 37 on page 175 should be revised to show the Bay Area's current attainment status. The Bay Area is currently a nonattainment area for federal and state ambient air quality standards for ground level ozone and state standards for particulate matter. Earlier this month, the Bay Area was designated as a nonattainment area for the new federal 8-hour ozone standard. The air quality standards are set by the national and state governments at levels to protect public health and welfare.

Comments
2-6
2-7
2-8

We are concerned about the lack of detail in the DEIS concerning the National Park Service's responsibility with regards to the Clean Air Act's Regional Haze Regulation and discussion on how the preferred alternative's impacts upon regional haze can be mitigated. As a Class I airshed, Pt. Reyes is a critical natural area that the federal government has determined needs visibility improvement. In addition to the projected annual fire management emissions for all three alternatives (Tables 44, 46 and 48), please provide estimates of the number of burn days per year and the associated amount of daily emissions in tons per day. On page 174, the DEIS describes the recent findings of a cooperative program, the Interagency Monitoring of Protected Visual Environments (IMPROVE), that visibility in the park improved between 1996 and 1999. Please provide information on the monitoring site where IMPROVE data was collected, especially the site's location relative to fire activity including the appropriate fire management unit. This information will help explain the FMP's daily impact on regional haze relative to where visibility monitoring will occur to determine compliance with the upcoming federal regional haze requirements.

Comment 2-4. Burning in wetlands requires conformance with BAAQMD Regulation 5, Sections 40 1.13 and 410 which describe marsh management fire requirements.

Response to Comment 2-4. The following additional text will be inserted as a new paragraph in the Final EIS on page 298, paragraph 1, Prescribed Fire.

Burn plans that include prescribed burning in wetland areas are subject to the conformance with additional regulations when applying to BAAQMD. In addition to the SMP and other submittals, Regulation 5, Section 410, Marsh Management Burn Requirements, asks for an evaluation of non-burning alternatives that could achieve land management objectives in keeping with resource management plans that apply to the project area. Regulation 5, Section 401.13 includes more detailed guidance for planning prescribed burns that involve wetland acreage.

Comment 2-5. Table 37 does not reflect current attainment status.

Response to Comment 2-5. Table 37 is revised as requested.

Pollutant	Averaging Time	California Standards ¹		National Standards ²	
		Concentration	Attainment Status	Concentration ³	Attainment Status
	8 hour			0.08 ppm	N
Ozone (O ³)	1 hour	0.09 ppm (180 µg/m ³)	N	0.12 ppm (235 µg/m ³)	N ⁴

Comment 2-6. More detail is needed on how the preferred alternative's impacts on regional haze can be mitigated.

Response to Comment 2-6. Mitigation measures that address the impacts of the preferred alternative on regional haze are found on DEIS pages 56 and 57, particularly measures A-1, A-2, A-5, A-6 and A-7 and are included in the Final EIS.

Comment 2-7. Please provide estimates on the number of burn days per year and the associated amount of daily emissions in tons per day.

Response to Comment 2-7. The Point Reyes National Seashore Fire Management Officer, Roger Wong, has provided a per event breakdown of the annual estimated emissions listed in the FMP EIS.

Daily Emissions for FMP Alternatives
(all emission levels given in tons per burn day)

Alternative	Acres treated	Burn Days per year	PM ₁₀	PM _{2.5}	Methane	CO	NO _x
Alternative A	500 acres	10 total burn days					
Grass scrub	495 acres	9	2.3	2.0	0.6	5.1	0.1
Understory	5 acres	1	2.9	2.4	1.4	28.3	0.8
Alternative B	1000 acres	20 total burn days					
Grass scrub	849 acres	15	2.5	2.0	0.6	5.1	0.1
Understory	153 acres	5	17.5	15.0	8.4	173.3	5.0

Alternative C	2000 acres	35 total burn days					
Grass scrub	1,724 acres	20	3.9	3.3	1.0	8.2	0.2
Understory	276 acres	15	10.5	8.9	5.0	104.2	3.0

The annual maximum acreages of prescribed burning were developed with the assumption that the program described in the alternative would be implemented with optimum funding and staffing to support this level of activity from an operational stand point. For purposes of these emission estimates, “per event” should be considered equivalent to “per day”. If, subsequent to the NEPA process, the park does not receive optimum funding for implementation of the FMP, the amount of acreage treated annually could be considerably less than proposed in the EIS. With that possibility acknowledged, the emissions presented in the EIS may overstate emissions generated as the FMP is implemented.

Comment 2-8. Please provide information on the monitoring site where IMPROVE data cited on page 174 was collected.

Response to Comment 2-8. Air quality monitoring at Point Reyes National Seashore has included particulate matter (PM2.5 and PM10), hourly ozone, and SO2 (see Table VII-3 below). The aerosol sampler in the park began operation in March of 1988. It is located at the North District Ranger Station, south of Tomales Bay State Park and north of Point Reyes Hill in the Inverness Ridge FMU. The location of the aerosol sampler is shown in Figure VII-3 excerpted from Assessment of Air Quality and Air Pollutant Impacts in Class I National Parks of California (April 2001). The status of Point Reyes air quality is Chapter VII of the full report which can be found on the NPS Air Quality website at:

<http://www2.nature.nps.gov/air/Pubs/CAreview/CAreport.pdf>. The automatic 35mm camera was located on a peninsula at the south-west corner of Drakes Bay and operated from June 1987 through April 1995. The camera viewed east across Drakes Bay towards the Point Reyes Wilderness area.

Table VII-3. Air quality monitoring at PORE		
Species	Site within park	Site within 50 km
Ozone, hourly	NPS**	
Ozone, passive	NPS*	
SO2	NPS	
PM10	IMPROVE	
PM2.5	IMPROVE	
Wet deposition		ARB**
Dry deposition		
Visibility		
* New site		
** Closed before 1994		

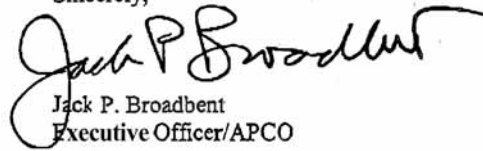
Mr. Don L. Neubacher

-3-

April 23, 2004

For more information on the District's prescribed burning requirements and policies, please contact Doug Tolar, Air Quality Specialist II, in our Compliance and Enforcement Division at (415) 749- 5 118. If you have any questions regarding these comments, please contact Suzanne Bourguignon, Environmental Planner, at (415) 749-5093.

Sincerely,



Jack P. Broadbent
Executive Officer/APCO

JPB:SB

cc: BAAQMP Director Harold C. Brawn, Jr.

Point Reyes National Seashore and Vicinity Air and Water Monitoring Stations & Hydrography

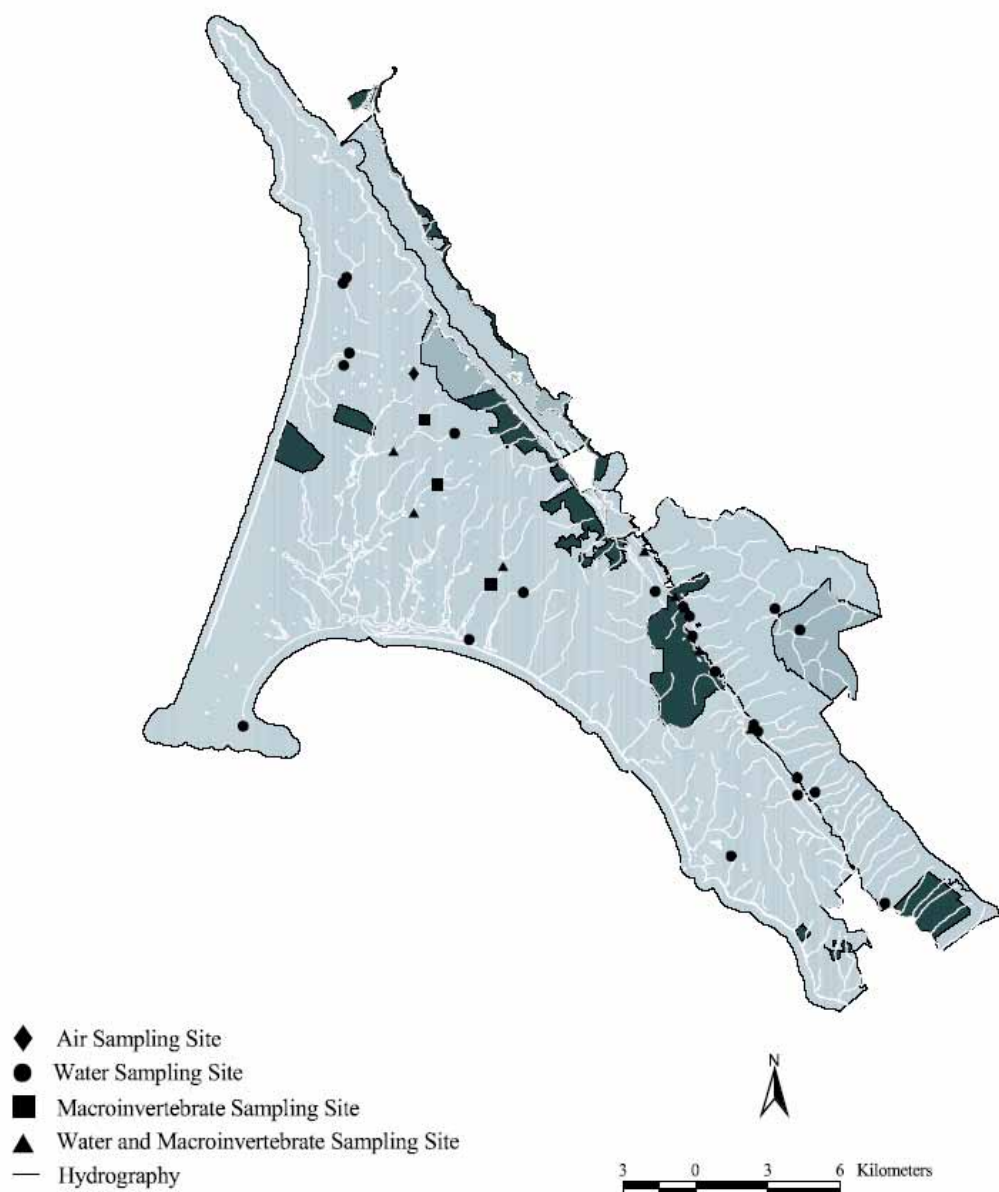


Figure VII-3. Hydrography of PORE. Also shown are the locations of air quality and water quality sampling sites monitored by the NPS.

Comment Letter 3. State Clearinghouse and Planning Unit, Sacramento, CA. Terry Roberts, Director.



Arnold
Schwarzenegger
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Jan Boel
Acting Deputy
Director

April 27, 2004

Don Newbacher
National Park Service
Point Reyes National Seashore
Point Reyes, CA 94956

Subject: Draft Fire Management Plan/EIS
SCH#: 2004024002

Dear Don Newbacher:

The State Clearinghouse submitted the above named Negative Declaration to selected state agencies for review. The review period closed on April 23, 2004, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts
Director, State Clearinghouse

RECEIVED	
Point Reyes National Seashore	
APR 28 '04	
<input checked="" type="checkbox"/>	SUPT.
<input type="checkbox"/>	ASST. SUPT.
<input type="checkbox"/>	SPEC. PK. USES
<input type="checkbox"/>	LAW ENFORC.
<input type="checkbox"/>	RES./SCIENCE
<input type="checkbox"/>	RANGE CONS.
<input type="checkbox"/>	FIRE MGT.
<input type="checkbox"/>	INTERP.
<input type="checkbox"/>	CULT. RES.
<input type="checkbox"/>	MAINT.
<input type="checkbox"/>	CONTRACTING
<input type="checkbox"/>	PERSONNEL
<input type="checkbox"/>	BUDGET
<input checked="" type="checkbox"/>	CENTRAL FILES

The letter received from the State Clearinghouse states that no comments were received from the list of state agencies that received a copy of the FMP/EIS by the close of the commenting period on April 20,2004. The Clearinghouse also notes that the PRNS FMP/EIS has complied with the review requirements of the California Environmental Quality Act (CEQA) for environmental documents.

Response to Letter 3. No response required.

Comment Letter 4: Board of the Inverness Ridge Association, Inverness, CA. Anthony Prud'homme, Director.

Don Neubacher
Superintendent
Point Reyes National Seashore
Point Reyes, CA 94956
ATTN: FIRE MANAGEMENT PLAN

Dear Don:

The Board of the Inverness Ridge Association wishes to thank you and the PRNS staff for the fine work in developing a fire management plan for the Point Reyes National Seashore, and the Northern District of the Golden Gate National Recreation Area. Three members of the IRA Board (Bill Carlin, Anthony Prud'homme, and Mary Anne Warren) attended the March 18 workshop on the Draft Fire Management Plan Environmental Impact Statement, and found it to be both helpful and informative. We appreciate the opportunity to comment.

Of the three approaches discussed in the draft statement, we strongly support Alternative C, which is also the alternative preferred by the Park. Alternative C has many advantages, of which three appear to us to be salient.

The first advantage of Alternative C is that it permits fuel reduction to be done on up to 3,500 acres, as compared to 2,000 under Alternative B, the other option that is being seriously considered. We understand that Alternative C is estimated to permit the reduction of hazardous fuels to proceed at a rate that will accomplish a significant reduction in the risk of catastrophic fire within 13 years—as compared to 23 years under Alternative B. For those who live close to the park, this represents a substantial gain in safety, especially given the rapid regrowth in the areas burned in the 1995 Vision Fire. As we know from the work that we have done on our own properties, and in and around Paradise Ranch Estates—much of it with funding from the Wildland Urban Interface grants that the Park has generously provided—it is also more cost-effective, and produces a more aesthetically attractive result, if the regrowth areas are thinned before the Bishop pines become too large.

The second advantage of Alternative C is that it calls for more vegetation control (by mechanical methods only) along the Inverness Ridge Trail, from Limantour Road to the top of Mount Vision. For those of us in PRE, this is a crucial safety

RECEIVED
Point Reyes National Seashore
APR 5 '04
Inverness Ridge Association
SUP. P.O. Box 342
ASST. SUP. Inverness, CA 94937
SPEC. FR. APR 12, 2004
LAW ENFORCE.
RES./SCIENCE
RANGE CON.
FIRE MGT.
INTERP.
CULT. RES.
MAINT.
CONTRACTING
PERSONNEL
BUDGET

**Comment
4-1**

Comment 4-1. The Inverness Ridge Association supports Alternative C, the preferred alternative of the NPS. Alternative C has three advantages:

- a) Permits fuel reduction on a greater amount of acres, thereby proceeding in the reduction of hazardous fuels at a more rapid rate and allows Bishop pine regrowth stands to be thinned while still small.
- b) Allows for more fuel reduction along the Inverness Ridge Trail, and
- c) The accelerated pace permitted under Alternative C allows the NPS and adjacent WUI communities to benefit from the current availability of federal funding for fire hazard reduction programs.

Response to Comment 4-1. Comment and preference noted.

Comment
4-1
continued

factor. Creating more defensible zones will greatly improve the chance of stopping fires in this area. We greatly appreciate the work that has already been done on the part of the Inverness Ridge Trail that is our emergency exit, from the end of Sunnyside Road to Limantour Road, and we support similar maintenance of the portion of the trail between the end of Sunnyside and the summit of Mount Vision. If this portion of the trail can be made more passable to emergency vehicles, this will also improve the odds of stopping a fire before it reaches PRE, Inverness, or Inverness Park.

The third advantage of Alternative C, which was noted at the March 18 workshop, is that federal funding appears to be available now for fire management projects in and around PRNS and GGNRA. Since this opportunity may be of limited duration, we think it desirable to proceed with all due speed. We are confident that the expertise of the PRNS staff will ensure that the work will be done without damage—indeed, with some gain—to the beauty of the landscape, and the health of native plant and animal species. In this regard, Ismael Gutierrez and his crew are also a great resource, as they have become highly skilled and efficient in thinning vegetation with minimal disturbance to birds, animals, and endangered plants in the area.

Thank you again for all the time and thought that has gone into developing a fire management plan, informing the community about the alternatives under consideration, and requesting feedback.

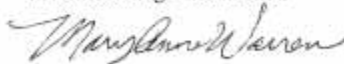
Comment
4-2

Incidentally, we were pleased to learn that there will an e-mail list for those who wish to be informed about dates and locations for prescribed burns, and (with permission) we will let our members know how to get on the list.

Sincerely yours,



Anthony Prud'homme, President
Inverness Ridge Association



Mary Anne Warren, Secretary
Inverness Ridge Association

Comment 4-2. The membership of Inverness Ridge Association would like the opportunity to be apprised of the availability of email notification lists for prescribed burning.

Response to Comment 4-2. The Education Specialist for the Fire Program will continue to advertise the availability of the NPS email notification list notifying residents of upcoming fire management activities that could affect the local community, including the Inverness Ridge Association and other local homeowners' groups.

Comment Letter 5. Susan and John Van Der Wal, Inverness, CA.

SUSAN VAN DER WAL

PHOTOGRAPHER

P.O. BOX 264
315 VISION ROAD
INVERNESS, CALIFORNIA 94937-0264

Tel: (415) 669-7544
Fax: (415) 669-1739
email: jvdwal@svn.net

RECEIVED
Port Reyes National Seashore
APR 20 04
SUPT.
ASST. SUPT.
SPEC. PK. U.S.
LOW ENFORC.
USFS OFFICE
APR 19 2004
RANGE CONS.
FIRE MGT.
INTERP.
CULT. RES.
MAINT.
CONTRACTING
PERSONNEL
BUDGET
CENTRAL FILES

Mr. Don L. Neubacher
Superintendent
Pt. Reyes National Seashore
Pt. Reyes Station, CA 94956

Attn: FIRE MANAGEMENT PLAN

Dear Superintendent Neubacher:

We have reviewed the DEIS for PRNS and the northern lands of GGNRA and have the following comments and concerns.

Comment
5-1

Pollution: Health reasons - the breathing of smoke hiking, our homes outside during chores, enjoying our deck, windows open for the clear fresh air and airing house out on a daily basis. Constant days, weeks, months and years of this is very undesirable to say the least. It affects our communities as we all run errands. Noise from equipment on ground and planes and helicopters. We already have a major problem with the planes flying over the areas and all the parks. All this infringes on the solitude we all seek and one of many reasons most of us moved out here in the first place.

Comments

5-2

5-3

5-4

Aesthetics: The constant burning and even intermittently does not solve the problems. Unsightly views of burned environment throughout the parks and roadway views; destroying non-native trees will eliminate shade for humans, wildlife and the habitat, nesting, etc. Wildlife needs bushes and use them for safety, shade, hunting, nesting (deer, elk, bobcats, etc. leave young among these bushes which you will be destroying.) The burned environment only gets green after a lot of rain which is winter time. We are very concerned about the effect of such a plan to the wildlife. We want to hear, see the many varied birds in the grasslands, trees, bushes not less no matter non-native, we love the whole feel and experience of our many hikes to Wittenberg and loops, Estero, Greenpicker to Pirtop, etc. We are not keen on "experimental-pilot burns" either. While protecting private property has its merits, we see the forest, removing under-brush has become excessive taking away individual privacy. Using the private property as an excuse for other motives. There is a lot of hyperbole and the attempt to force fear into the public - works the opposite with us.

We chose to live here for the woods with the variety of trees and natural untouched beauty and the parks bordering our village of Inverness. We have been here for 22 years and are well aware there are risks living in such environment. But life is full of risk. We had one fire and the

(over)

Comment 5-1. Fire management actions will generate smoke, a health hazard, and increase noise from ground equipment and aircraft used in fire response.

Response to Comment 5-1. Prescribed burning does generate smoke but under conditions meeting the criteria of the Bay Area Air Quality Management District. Smoke generation is a short-term impact, lasting the duration of active prescribed fire and is localized in effects. Smoke generation would have greatest effects when prescribed burning is conducted in close proximity to residential areas. The primary residential areas adjacent to park lands are the Bolinas mesa and Paradise Ranch Estates. The BAAQMD requires a Smoke Management Plan for all prescribed fire as a means to assess potential affects of the fire on air basin air quality and potential health effects of smoke on adjacent residents. In conformance with BAAQMD requirements, the SMP includes the following project information:

- location and specific objectives of each proposed bum;
- acreage, tonnage, type, and arrangement of vegetation to be burned;
- directions and distances to nearby sensitive receptor areas;
- fuel condition, combustion and meteorological prescription elements for the project;
- projected bum schedule and expected duration of project ignition, combustion, and bum down
- (hours or days);
- specifications for monitoring and of verifying critical parameters including meteorological
- conditions and smoke behavior before and during the bum;
- specifications for disseminating project information to public;
- contingency actions that will be taken during the burn to reduce exposure if smoke intrusions impact any sensitive receptor area;
- certification by a qualified professional resource ecologist, biologist, or forester that the proposed burning is necessary to achieve the specific management objective(s) of the plan;
- a copy of the environmental impact analysis prepared for the plan that includes an evaluation of alternatives to burning, if such an analysis was required by state or federal law or statute;
- project fuel loading estimate (tons vegetation/acre) by vegetation type(s) and a description of the calculation method; and
- particulate matter emissions estimate including referenced emission factor(s) and a description of the calculation method used. (BAAQMD, Regulation 5, Open Burning, Section 408).

The Draft EIS addressed the impacts of smoke on air quality and on human health on pages 232, and 395-396 (Alternative A), pages 236 and 398 (Alternative B) and pages 240 and 400 (Alternative C). Impacts from increased noise generated by heavy equipment and chainsaws, particularly during suppression actions is addressed on page 380-384 (Alternative A), 385-386 (Alternative B) and 387-389 (Alternative C). The FMP does not propose use of aircraft. Noise generation from aircraft would occur as part of wildfire suppression actions that could occur with

or without the FMP and is not an effect of the FMP.

Comment 5-2. Prescribed burning will leave areas looking unsightly until the rains.

Response to Comment 5-2. The assessment is accurate. Given the potential for a large-scale wildfire to drastically alter the park setting, prescribed burning resulting in scattered areas of blackened acreage that revegetates quickly would be preferable to the effects of hotter, more damaging wildfire that would burn indiscriminately altering sensitive viewsheds. Areas subject to prescribed fire would appear blackened until regrowth occurs with winter rains. These short-term, moderate, adverse impacts are described for the three alternatives on pages 380-381 (Alternative A), page 385 (Alternative B) and page 387 (Alternative C).

Comment 5-3. Removing non-native vegetation will eliminate shade for humans and animals alike, remove screening understory vegetation and valuable habitat provided by the understory.

Response to Comment 5-3. As discussed in the Draft EIS, mechanical removal and prescribed burning of understory vegetation would have both adverse and beneficial short-term impacts on wildlife. Certain species, such as woodrats, may be attracted to temporarily stockpiled vegetation debris and displaced later during pile burning. Other wildlife species, such as deer, could benefit from improved foraging in clearings. In addition, the project actions themselves, involving vehicles and chainsaws among other equipment, would generate noise and locally disturb wildlife in the vicinity of projects over the short-term. Discussion of impacts of fire management actions on wildlife is addressed on pages 302 to 316. Impacts to special status wildlife species, in addition to special status plant species, are discussed on pages 323 through 368.

Comment 5-4. Commenters are not in favor of experimental pilot burns; reducing understory brush takes away individual privacy. The potential fire hazard has been exaggerated.

Response to Comment 5-4. As described on Draft EIS pages 87-89, recurring wildfires are part of the ecology of the Point Reyes peninsula. It's true that the degree of fire hazard varies throughout the year, but the Vision Fire and other conflagrations in the Bay Area have shown that extreme fire hazard conditions can develop in late summer and early fall.

parks, agencies involved go ballistic!

Comment
5-5

We are concerned about the exact location of those "staging areas" and "fire barriers" which involve construction/destruction and the visibility factor.

Comment
5-6

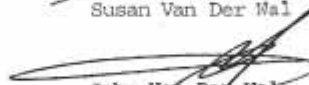
The report refers to "visitors experience" but what about the locals who live and work here and the communities experience? You can't imagine how visitors reactions to burning and other noises relating to Fire Management Plan have on their visits. Many people do get out of their cars, hike, picnic, etc. We certainly would not encourage anyone to come out here with the burning and other activities pertaining to the plan. We experienced first hand a control burn gone out of control at Banff National Park, Canada during the height of the summer (best weather) and tourist season. It was terrible and in such a gorgeous area - smoke and noises constant - so much for seeing the Canadian Rockies in clear blue sky. A real stupid plan by Canadian officials. Your plan calls for burning/mechanical treatment on weekdays (for the locals) and no workweekends/holidays (for the visitors and Bay Area visitors). Many tourist come out weekdays simple because they are traveling from out of state/country and many visitors come weekdays to avoid the crowded weekends. The public doesn't really know how massive Alternative B/C are and many people do not want to express any thoughts on the Plan publicly for fear they would be looked upon as anti-fire management. We aren't either but, find the B/C and particularly C is too massive and very aggressive which is what you want. We prefer Alternative A - no more action.

Reviewing the DFMP/EIS was most educational and very thorough, time consuming and costly. It's our second such review report this year - the other was Tomales Bay State Park.

Thank you for the opportunity to comment on the Plan.

Sincerely,


Susan Van Der Wal


John Van Der Wal

sk/

We may be contacted by e-mail (front page of this letter). The local post offices are best for fire burn days. ^{post offices} do not go daily to the Bovine Bakery which is open daily.

Comment 5-5. Commenters are concerned about the exact location of areas where disturbance would occur such as staging areas and fire lines around prescription burns.

Response to Comment 5-5. The FMP has a broad focus and does not identify the location of specific projects but rather ways to mitigate the effects of specific future projects by reducing the level of affect on soils, vegetation and viewshed by careful siting. For example, on Draft EIS page 58, under Mitigation Measure W-3, helispots, staging areas, and spike camps would be located at least 100 feet away from streams, creeks, and other water bodies. Measure V-1 requires that existing roads or trails be used as firebreaks for prescribed burns and for wildland fire suppression whenever possible in order to reduce disturbance, vegetation removal and aesthetics effects. Additional measures to rehabilitate lands disturbed by project actions are found on pages 55 through 59. All specific projects would be assessed for conformance with the guidelines and mitigation measures described in the Draft EIS.

Comment 5-6. The FMP DEIS should consider the affects of fire management actions on nearby residential communities as well as the visitor experience.

Response to Comment 5-6. Both the Draft and Final FMP addresses the effects of fire management actions on residential neighborhoods as part of the air quality assessment (localized smoke effects), impacts to visitor use and visitor experience (noise and visual effects) and public health and safety (smoke inhalation).

Comment 5-7. The Commenters prefer Alternative A; annual acreage amounts under Alternatives B and C are too large.

Response to Comment 5-7. Comment and preference noted.

Comment Letter 6. Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service. Rodney R. McInnis, Acting Regional Administrator

htw7
FMP

RECEIVED
Point Reyes
National Seashore
MAY 19 04

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southwest Region
501 West Ocean Boulevard, Suite 4800
Long Beach, California 90802-4213

May 17, 2004

In Response Refer To:
151422SWR04SR9246:PJ

Don L. Neubacher
Superintendent
Point Reyes National Seashore
Point Reyes, CA 94956

Dear Mr. Neubacher:

Thank you for your letter requesting concurrence with your determination that the actions proposed in the Point Reyes National Seashore (PRNS) Fire Management Plan may affect, but are not likely to adversely affect, Central California Coast (CCC) coho salmon (*Oncorhynchus kisutch*) and CCC steelhead (*O. mykiss*). In addition, the PRNS has determined that the proposed action is not likely to destroy or adversely modify critical habitat designated for CCC coho salmon. The PRNS has also determined that the project will not adversely affect Essential Fish Habitat (EFH) as designated under the Magnuson-Stevens Fishery Conservation and Management Act (MSFCM) for Pacific salmon, including coho salmon and Chinook salmon.

The PRNS proposes a framework for all fire management activities, including wildfire suppression, on land managed by PRNS and the Northern Districts of Golden Gate National Recreation Area. The seashore and the recreation area are located along the California coast within Marin County. The fire management plan is anticipated to guide the fire management program for the next 10 to 15 years. Information on proposed management activities and potential effects to salmonids have been provided to the National Marine Fisheries Service (NOAA Fisheries) by the Draft Environmental Impact Statement, consultation initiation letter, and through oral communication with PRNS staff.

Endangered Species Act (ESA)

Based on the information provided, I concur with PRNS that the project as proposed is not likely to adversely affect threatened CCC steelhead, CCC coho salmon, or destroy or adversely modify critical habitat designated for CCC coho salmon. This concludes consultation for the PRNS Fire Management Plan in accordance with 50 CFR section 402.14(b)(1). However, if new information becomes available indicating that listed species may be adversely affected by the project in a manner not previously considered, or if the project plans change, further consultation may be necessary.

Comment
6-1

cc -
W. P. P. P. P.

NOAA

Comment 6-1. The National Marine Fisheries Service (NMFS) concurs that the project as proposed is not likely to adversely affect threatened fish species or adversely modified critical fish habitat. If the project plans change or new information on the listed species indicates a potential adverse effect, further consultation may be necessary.

Response to Comment 6-1. The following text for mitigation measure SS-7 is added to the FMP Final EIS.

SS-7 The annual work plan for FMP implementation will be provided to NOAA Fisheries each year to allow that agency to monitor the types of project proposed.

Mammon-Stevens Fishery Conservation and Management Act

Amendments to the MSFCMA in 1996 require Federal agencies to consult with NOAA Fisheries regarding any action or proposed action that may adversely affect EFH for Federally-managed fish species. For more information on EFH, see our website at "<http://swr.nmfs.noaa.gov>."

**Comment
6-2**

NOAA Fisheries has evaluated the proposed project for potential adverse effects to EFH pursuant to section 305(b)(2) of the MSFCMA. The area affected by the project is part of EFH designated by the Pacific Fisheries Management Council for Pacific Salmon. Based on the information provided by PRNS, EFH Conservation Recommendations are not necessary. However, if the proposed action is modified in a manner that may adversely affect EFH, PRNS will need to reinitiate EFH consultation with NOAA Fisheries.

If you have any questions concerning this consultation, please contact Mr. Peter Johnsen at (707) 468-4063.

Sincerely,


Rodney R. McInnis
Acting Regional Administrator

cc: Jim Lecky, NOAA Fisheries

Comment 6-2. NMFS administers section 305(b)(2) of the Magnuson-Stevens Fishery Conservation and Management Act requiring federal agencies to consult with NMFS regarding the potential of projects to adversely affect “essential fish habitat.” The project area is part of the EFH for Pacific Salmon. The FMP as proposed does not require conservation recommendations but if the proposed work plan is modified, PRNS will need to reinitiate consultation with NMFS.

Response to Comment 6-2. See response to Comment 6-1.

Comment Letter 7. Environmental Action Committee of West Marin. Catherine Caufield,
Executive Director.

27617
FMP

eac

The Environmental Action Committee of West Marin

May 11, 2004

Superintendent Don Neubacher
Point Reyes National Seashore
Point Reyes Station, CA 94956

RE: Draft Fire Management Plan Environmental Impact Statement. Point Reyes
National Seashore and North District of Golden Gate National Recreation Area

Dear Superintendent Neubacher,

The Environmental Action Committee of West Marin is very impressed with the detail of your presentation in the Draft Fire Management Plan. Having reviewed the plan, we believe that the Preferred Alternative (Alternative C) is the best one.

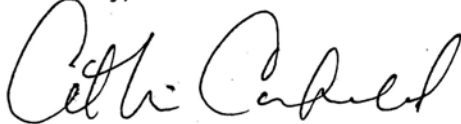
The Preferred Alternative works well with the community fire protection actions that EAC outlined in the 1996 Phoenix Report, and also with our other goals of protection and enhancement of biological diversity, containment of spread of invasive exotic plants and promoting practical research opportunities.

EAC also suggests that NPS coordinate with Tomales Bay State Park in its fire management planning efforts, as they are outlined in the Draft TBSP General Plan.

We hope that the National Park Service can continue to be a leader in the implementation of projects that reduce the threats to the environment that result from catastrophic wildfires. We are pleased to support Point Reyes National Seashore in its efforts to restore the ecological role of fire.

Thank you for the opportunity to comment.

Sincerely,



Catherine Caufield
Executive Director

RECEIVED	
Point Reyes National Seashore	
MAY 17 '04	
<input checked="" type="checkbox"/>	SUPT.
<input checked="" type="checkbox"/>	ASST. SUPT.
<input checked="" type="checkbox"/>	SPEC. PK. U.S.
<input checked="" type="checkbox"/>	LAW ENFORCE.
<input checked="" type="checkbox"/>	RES./SCIENT.
<input checked="" type="checkbox"/>	RANGE CONS.
<input checked="" type="checkbox"/>	FIRE MGT.
<input checked="" type="checkbox"/>	INTERP.
<input checked="" type="checkbox"/>	CULT. RES.
<input checked="" type="checkbox"/>	CONTRACTING
<input checked="" type="checkbox"/>	PERSONNEL
<input checked="" type="checkbox"/>	BUDGET
<input checked="" type="checkbox"/>	CENTRAL FILES

cc
point

Comment 7-1. Commenter expresses preference for the Preferred Alternative.

Response to Comment 7-1. Comment and preference noted.

Comment 7-2. Commenter recommends NPS coordinate fire management planning efforts with Tomales Bay State Park as outlined in the Draft TBSP General Plan.

Response to Comment 7-2. Comment noted. The NPS has cooperated with Tomales Bay State Park through the federal Wildland Urban Interface Program and will continue to work cooperatively with State Parks to reduce fire hazards in West Marin.

